

EXHIBIT 42

In the Matter Of:
HERNANDEZ vs WELLS FARGO

18-cv-07354-WHA

DEBORA M. GRANJA

June 06, 2019

VOLUME I



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1	damage at that time caused by Wells Fargo?	01:49:29
2	A Not that I can recall at this moment.	01:49:39
3	Q Okay. I'd like to talk about the period	01:49:41
4	of time after the foreclosure. Can you tell me what	01:49:43
5	harm you faced during that time?	01:49:47
6	A After the foreclosure of what date	01:49:51
7	specifically?	01:49:54
8	Q I think you said the foreclosure was in	01:49:54
9	2012?	01:49:57
10	A That was my understanding at the time --	01:49:58
11	Q Okay.	01:50:00
12	A -- 2012.	01:50:00
13	Q Okay.	01:50:02
14	A And, I'm sorry, could you please rephrase	01:50:03
15	the question.	01:50:04
16	Q So, I'm just trying to get a sense of the	01:50:05
17	damages that you feel, you know, you were facing	01:50:07
18	during certain periods of time.	01:50:10
19	A Mm-hm.	01:50:12
20	Q And so I'm trying to compare damages from	01:50:14
21	before the foreclosure with after the foreclosure,	01:50:17
22	and I'd like it if you could walk me through, after	01:50:19
23	the foreclosure, what types of harm you were facing.	01:50:24
24	So, I guess, my question is, Could you	
25	talk about the harm you were facing following the	
		01:50:31

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1	foreclosure of your property?	01:50:34
2	A The one that was the most significant was	01:50:38
3	losing my home.	01:50:40
4	Q Yes.	01:50:42
5	A I've already talked about that.	01:50:43
6	Q Okay.	01:50:45
7	A Would you like me to go into that again?	01:50:45
8	Q What I'd like to know is where you ended	01:50:48
9	up moving --	01:50:51
10	A Okay.	01:50:52
11	Q -- after.	01:50:52
12	A Well, in addition to losing our home is	01:50:57
13	the impact that it had on my daughters and on me	01:50:59
14	emotionally. I lost my home, and, therefore, I lost	01:51:02
15	financial aid, affected me because I lost my tax	01:51:07
16	write-off from my home. It affectedly my credit	01:51:12
17	store, which had been stellar prior to that time. I	01:51:16
18	had to pay for moving and storage costs. I ended up	01:51:19
19	moving to Alameda, California, following Brentwood,	01:51:25
20	when I left Brentwood. That was the question you	01:51:29
21	had.	01:51:33
22	Q Okay. Can you tell me about -- you	01:51:33
23	mentioned the impact emotionally on your daughters.	01:51:39
24	Can you expand upon that?	01:51:43
25	A Yes.	01:51:47

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1	that.	05:17:27
2	Q Okay. Skip forward and go through, like,	05:17:36
3	a series of questions quickly, and then we'll take a	05:17:44
4	break, probably our last break, if that's okay.	05:17:47
5	Push on. All right.	05:17:51
6	I think you mentioned earlier that you	05:17:53
7	know this case is a class action; is that correct?	05:17:55
8	A Correct.	05:17:57
9	Q What does that mean to you?	05:17:59
10	A It means that I am not the only one that	05:18:06
11	was damaged as a result of Wells Fargo's actions.	05:18:08
12	Q Okay. Have you ever been a class	05:18:14
13	representative for a class action before?	05:18:17
14	A No.	05:18:19
15	Q How would you describe your duties as a	05:18:21
16	class representative?	05:18:23
17	A I am to maintain contact with my attorneys	05:18:27
18	in the matter. I am to produce all documents in	05:18:35
19	evidence that I'm able to in this matter. I am to	05:18:41
20	proceed with the best interest of all of the parties	05:18:49
21	involved, with their interest above and beyond my	05:18:51
22	individual interest.	05:18:58
23	Q Okay. Is that, generally speaking, what	05:18:59
24	you understand your duties to be?	05:19:02
25	A That's generally speaking.	05:19:04

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1	Q Okay. How do those differ -- or those	05:19:05
2	duties differ from those of an individual plaintiff	05:19:10
3	in a nonclass action?	05:19:12
4	A If it were only me?	05:19:15
5	Q Yes.	05:19:16
6	A I would be the only individual being	05:19:21
7	represented by my attorneys. It would be my -- my	05:19:23
8	interest only that would come before anybody else's.	05:19:28
9	Q Okay. Do you know the classes of	05:19:36
10	individuals that you represent in this action?	05:19:38
11	A I don't know what that means.	05:19:41
12	Q Do you know -- strike that.	05:19:45
13	Do you know what duties you have to the	05:19:52
14	other class members?	05:20:01
15	A To represent them as well as myself.	05:20:04
16	Q Do you know what your compensation will be	05:20:10
17	at the end of the day, if this is successful?	05:20:13
18	A I have no idea.	05:20:15
19	Q I think you said this earlier, but you	05:20:22
20	first approached Gibbs to represent you, correct?	05:20:23
21	A Correct.	05:20:28
22	Q Okay. And I think you first learned of	05:20:31
23	them through the letter, correct?	05:20:35
24	A Through the letter from Wells Fargo?	05:20:38
25	Q Yes.	05:20:40

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1	A Yes.	05:20:40
2	Q What do you hope to get out of this	05:20:47
3	lawsuit?	05:20:49
4	A Justice.	05:20:53
5	Q Anything else?	05:20:57
6	A Compensation for myself and for everyone	05:20:59
7	else that was injured as result of Wells Fargo's	05:21:01
8	actions.	05:21:05
9	Q I think you mentioned this earlier, but	05:21:08
10	what has been your role in preparing for this case?	05:21:10
11	A What has been my role?	05:21:15
12	Q What actions have you taken in preparing	05:21:17
13	for this case?	05:21:19
14	A Oh. I've maintained contact with my	05:21:21
15	attorneys. I've reviewed any documents that were	05:21:27
16	provided to me by my attorneys. I've assisted in	05:21:31
17	the preparation of any responses. I've done	05:21:36
18	everything that I could to locate any documentation	05:21:44
19	or evidence regarding this case.	05:21:48
20	Q Okay. Approximately how many times have	05:21:54
21	you met with your attorneys in person related to	05:21:56
22	this case?	05:21:59
23	A Twice.	05:22:00
24	Q Okay. For how long?	05:22:01
25	A Yesterday approximately two hours. This	05:22:04

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1	morning, I think I estimated four hours. Maybe it	05:22:09
2	was -- yeah, four hours.	05:22:13
3	Q Okay. And approximately how many times	05:22:15
4	have you spoken with them over the phone?	05:22:16
5	A Oh, I -- I have no idea.	05:22:18
6	Q Less than five.	05:22:23
7	A Probably more than five.	05:22:25
8	Q Approximately how much time would you say	05:22:28
9	you've spent talking with your attorneys about the	05:22:31
10	case, over the phone?	05:22:33
11	A I can't estimate that. I -- I'm not sure.	05:22:37
12	Q Would you say it's been over five hours?	05:22:41
13	A Yes.	05:22:44
14	Q Okay. Have you written any, like, letters	05:22:46
15	or e-mails to your attorneys about the case?	05:22:51
16	A Yes.	05:22:54
17	Q Approximately how many?	05:22:54
18	A Ooh. I'm going to roughly conservatively	05:23:04
19	estimate maybe 20-plus.	05:23:08
20	Q Approximately how much time do you think	05:23:15
21	you've spent, like, writing those e-mails or	05:23:17
22	back-and-forth correspondence?	05:23:19
23	A In just the e-mails, not the phone calls.	05:23:28
24	Q Correct.	05:23:31
25	A Does that include prep time for the	05:23:31

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1	e-mails?	05:23:33
2	Q Sure. Yes.	05:23:33
3	A Oh. I'm estimating easily more than 40	05:23:35
4	hours.	05:23:52
5	Q Okay. Who are the other named plaintiffs	05:23:53
6	in the case, do you know?	05:24:01
7	A I don't know.	05:24:02
8	Q Okay. Have you ever met or spoken with	05:24:03
9	any of them?	05:24:05
10	A No.	05:24:06
11	Q So just adding up what you've told me	05:24:13
12	about only the contact you've had with your	05:24:16
13	attorneys, it seems like you had about six hours of	05:24:18
14	meetings in person, over five hours -- or five hours	05:24:19
15	meeting via the phone, so that would be 11, plus	05:24:23
16	more than 40 hours with e-mails. So a total of	05:24:28
17	about 50 -- over 50 hours that you've dedicated just	05:24:31
18	alone to speaking with your attorneys in the case.	05:24:35
19	Does that sound right?	05:24:38
20	A I'd say that's minimally that.	05:24:40
21	Q Okay. How much time do you anticipate	05:24:42
22	spending on the case in the next year?	05:24:44
23	A As much as needed.	05:24:47
24	Q Okay. Who makes the decisions regarding	05:24:48
25	the case against Wells Fargo: you or your	05:24:56

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1 would be shared with any person or entity that's not
 2 part of the firm? 05:35:45

3 A No. And could I qualify all of those
 4 answers as saying, if there was anything that was
 5 agreed upon, I don't remember any of that. 05:35:49
 05:35:52
 05:35:55

6 Q Okay. Do you have an engagement letter
 7 from the law firm? 05:35:57
 05:36:00

8 A My guess is yes. 05:36:03

9 Q Okay. But you don't recall the details. 05:36:04

10 A Correct. 05:36:06

11 Q Okay. Are you related to any -- or -- or
 12 friends with any of the attorneys representing you
 13 in this suit? 05:36:07
 05:36:18
 05:36:20

14 A Not that I know of as far as related to
 15 and, no, not friends with. 05:36:22
 05:36:24

16 Q Okay. You said before that you provided
 17 them with documents related to the allegations in
 18 the lawsuit; is that correct? 05:36:27
 05:36:34
 05:36:38

19 A Correct. 05:36:39

20 Q Have they also provided you with documents
 21 regarding this lawsuit? 05:36:39
 05:36:42

22 A Yes. 05:36:43

23 Q Okay. Okay. We are very close to done.
 24 What did you do to collect documents for
 25 this matter? 05:36:44
 05:36:53
 05:36:55

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1	A Lots.	05:36:58
2	Q Okay.	05:36:59
3	A Would you like me to go through the list?	05:37:00
4	Q I would like you to, yes.	05:37:02
5	A Okay.	05:37:03
6	Q Walk me through the steps you took,	05:37:04
7	please.	05:37:06
8	A Sure.	05:37:07
9	I did a search, electronic search, of all	05:37:07
10	of my e-mails sent and received. I did an	05:37:14
11	electronic search of a hard drive that I had -- or	05:37:19
12	have. I did a search through of all my hard	05:37:26
13	document files.	05:37:36
14	Q Did you look through your text messages?	05:37:40
15	A Text messages. I don't believe that there	05:37:45
16	was texting at the time of this.	05:37:50
17	Q Okay.	05:37:52
18	A And I -- oh, God, that's really, like,	05:37:57
19	making me so -- sound so old. Sorry.	05:37:57
20	I've had various phones. I don't believe	05:38:01
21	I would have looked through my text messages to	05:38:04
22	obtain information in this matter.	05:38:07
23	Q Okay. So, do you recall using your cell	05:38:09
24	phone to sends messages to friends or family or	05:38:13
25	anyone else about the foreclosure?	05:38:16

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1	A No.	05:38:17
2	Q Okay. Are there any documents related to	05:38:18
3	the case that you have not yet provided to your	05:38:20
4	attorney?	05:38:23
5	A No. Not that I'm aware of at all.	05:38:23
6	Q Okay. What does Bart Sloan know about the	05:38:25
7	case?	05:38:31
8	A Bart Sloan was a friend and confidant at	05:38:33
9	the time that I was going through the 2012	05:38:41
10	bankruptcy/foreclosure and through the period until	05:38:44
11	I left the area. He was a coworker that I commuted	05:38:50
12	with.	05:39:01
13	Q Okay. And what about Susan Knight?	05:39:01
14	A What does she know about?	05:39:03
15	Q The case.	05:39:06
16	A The case.	05:39:07
17	Q Well, does she know about the issues	05:39:08
18	underlying the case?	05:39:11
19	A She would be aware of the difficulties I	05:39:12
20	was having, at the time, in getting a modification,	05:39:16
21	and that I went through a bankruptcy and foreclosure	05:39:20
22	as a result.	05:39:26
23	Q Okay. We're going to take a quick break,	05:39:31
24	and then we'll resume and cover any bases we need to	05:39:35
25	cover to finish up.	05:39:38

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1 CERTIFICATE OF REPORTER

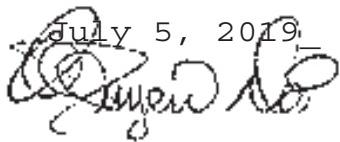
2 I, Quyen N. Do, CSR No. 12447, a Certified
3 Shorthand Reporter, hereby certify that the witness in
4 the foregoing deposition was, by me, duly sworn to tell
5 the truth, the whole truth, and nothing but the truth in
6 the within-entitled cause;

7 That said deposition was taken down in
8 shorthand by me, a disinterested person, at the time and
9 place therein stated, and that the testimony of the said
10 witness was thereafter reduced to typewriting, by
11 computer, under my direction and supervision;

12 That before completion of the deposition,
13 review of the transcript [] was [X] was not requested.
14 If requested, any changes made by the deponent (and
15 provided to the reporter) during the period allowed are
16 appended hereto.

17 I further certify that I am not of counsel or
18 attorney for either or any of the parties to the said
19 deposition, nor in any way interested in the event of
20 this cause, and that I am not related to any of the
21 parties thereto.

22 Dated: July 5, 2019



23
24
25
Quyen N. Do
CSR No. 12447